

Remarks

Reconsideration of the above-referenced application is respectfully requested.

Claim 4 stands rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicants regard as the invention. In particular, the Examiner notes that claim 4 depends from itself. Claim 4 has accordingly been amended to depend from claim 3.

Claim 6 stands rejected under 35 U.S.C. 102(b) as being anticipated by Bearden et al. (U.S. Patent No. 6,328,111). Claim 6 has accordingly been amended to specify that the pressure containment device comprises a first transversal bore within which a first pair of rams is positioned, a second transversal bore within which a second pair of rams is positioned and a grease supply bore which intersects the longitudinal bore between the first and second transversal bores.

Bearden clearly does not disclose this feature. As shown in Figure 2, Bearden's lubricator comprises the combination of a blowout preventer 17, a tool housing 21 and a grease injector assembly. The grease injector assembly can be considered to comprise the coiled tubing lubricator 57 and a pressure containment device comprising the BOP assembly 23, 26. The pressure containment device includes a housing, a longitudinal bore which extends through the housing, a first transversal bore (within the BOP 23) which intersects the longitudinal bore, a first pair of rams 25 which are positioned in the first

transversal bore, a second transversal bore (within the BOP 26) which intersects the longitudinal bore and a second pair of rams which are positioned in the second transversal bore.

However, Bearden's pressure containment device does not include a grease supply bore which intersects the longitudinal bore between the first and second transversal bores. Therefore claim 6 is not anticipated by Bearden.

Claims 1-3, 5, 7-9 and 11-15 stand rejected under 35 U.S.C. 103(a) as being obvious over Bearden in view of Helms et al. (U.S. Patent No. Re 39,509). In the Examiner's opinion, Bearden discloses every feature recited in claim 1, except for a sleeve positioned in the main bore. However, the Examiner states that Helms teaches using a wear sleeve in a bore to prevent wear on a cable passing through the bore. The Examiner therefore concludes that it would have been obvious to the person of ordinary skill in the art to include the wear sleeve of Helms in Bearden's bore in order to prevent wear on the cable passing through the bore.

Although applicants do not believe that this rejection is appropriate, claim 1 has been amended to more clearly distinguish applicants' claimed invention from the arrangement disclosed in Helms. Accordingly, claim 1 now requires that the sleeve lining comprise an inner diameter which corresponds to the outer diameter of the wire or cable. This feature is important in order to enable the grease to form an effective seal between the sleeve lining and the cable.

Moreover, Helms does not teach that the wear sleeve 62 should have an inner diameter corresponding to the outer diameter of the wire or cable. In fact,

it appears that the inner diameter of the wear sleeve 62 must be large enough to allow the tool which is connected to the wire or cable to pass through the wear sleeve (see column 3, lines 30-33).

Therefore, claim 1 is patentable over any permissible combination of Bearden and Helms. Furthermore, claims 2, 3, and 7-9 depend from claim 1. Therefore, these claims are patentable over any permissible combination of Bearden and Helms for the reasons stated above. In addition, claims 11-15 depend from claim 6, which as discussed above is patentable over Bearden. Therefore, claims 11-15 are patentable over any permissible combination of Bearden and Helms for the reasons stated above.

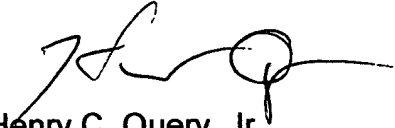
Claim 4 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Bearden in view of Helms as applied to claim 1, and further in view of Ward (U.S. Patent Application Publication No. 2004/0113108). However, claim 4 depends from claim 1, which as discussed above is patentable over any permissible combination of Bearden and Helms. Therefore, claim 4 is patentable over any permissible combination of Bearden, Helms and Ward for the reasons stated above.

The Examiner has stated that claims 10 and 16 would be allowable if they are rewritten in independent form to include the limitations of their base and intervening claims. However, claims 10 and 16 depend from claims 1 and 6, respectively, which as discussed above are patentable over the prior art cited by the Examiner. Therefore, applicants submit that claims 10 and 16 do not need to be rewritten.

In light of the foregoing, claims 1-16 are submitted as allowable.

Favorable action is solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. C. Query, Jr.', with a stylized flourish extending to the right.

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